

Hearing Date: May 4, 2021 at 10:00 a.m.
Objection Deadline: April 23, 2021 at 4:00 p.m.

Hunter J. Shkolnik (HS 4854)
NAPOLI SHKOLNIK, LLP
270 Munoz Rivera Ave., Suite 201
Hato Rey, PR 00918
Tele: (787) 493-5088
Hunter@NSPRLaw.com

and

Robert P. Fitzsimmons (WV Bar # 1212)
Clayton J. Fitzsimmons (WV Bar # 10823)
Mark A. Colantonio (WV Bar #4238)
FITZSIMMONS LAW FIRM PLLC
1609 Warwood Avenue
Wheeling, WV 26003
Telephone: (304) 277-1700

Counsel for:

*Brooke County Commission
Hancock County Commission
Monongalia County Commission
Lewis County Commission
Marshall County Commission
Ohio County Commission
Tyler County Commission
Wetzel County Commission
Marion County Commission
Doddridge County Commission
Randolph County Commission
Upshur County Commission*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X
	: Case No. 19-23649 (RDD)
In re:	:
	: Chapter 11
PURDUE PHARMA, L.P., <u>et al.</u> , ¹	:
	: Jointly Administered
Debtors.	:
	X

**JOINDER TO OBJECTION TO DEBTORS' MOTION
TO APPROVE DISCLOSURE STATEMENT**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

The **Brooke County Commission; Hancock County Commission; Monongalia County Commission; Lewis County Commission; Marshall County Commission; Ohio County Commission; Tyler County Commission; Wetzel County Commission; Monongalia County Commission; Marion County Commission; Doddridge County Commission; Randolph County Commission; and Upshur County Commission**, by counsel, file this joinder to the objection of the State of West Virginia (the “West Virginia Objection”) to the motion by Purdue Pharma, LP., *et. al.* (the “Debtors”) to approve the disclosure statement (the “Disclosure Statement”) to its Plan of Reorganization (the “Plan”).

For the reasons more fully set forth in the West Virginia Objection, the following parties object to approval of the Disclosure Statement:

Brooke County Commission
Hancock County Commission
Monongalia County Commission
Lewis County Commission
Marshall County Commission
Ohio County Commission
Tyler County Commission
Wetzel County Commission
Monongalia County Commission
Marion County Commission
Doddridge County Commission
Randolph County Commission
Upshur County Commission

The Plan Disclosure Statement, in its current form, deprives the aforementioned Counties of the ability to even assess the basis for the allocations to the states and local governments which is currently being proposed, and makes it impossible for the aforesaid Counties to meaningfully consider the Plan and/or make an informed decision concerning the Plan being proposed.

Dated: April 23, 2021

By: /s/ Mark A. Colantonio
Robert P. Fitzsimmons (WV Bar # 1212)
Clayton J. Fitzsimmons (WV Bar # 10823)
Mark A. Colantonio (WV Bar #4238)
FITZSIMMONS LAW FIRM PLLC
1609 Warwood Avenue
Wheeling, WV 26003
Telephone: (304) 277-1700

/s/ Hunter J. Shkolnik
Hunter J. Shkolnik (HS 4854)
NAPOLI SHKOLNIK, LLP
270 Munoz Rivera Ave., Suite 201
Hato Rey, PR 00918
Tele: (787) 493-5088
Hunter@NSPRLaw.com

Of counsel for Plaintiffs in:

***Brooke County Commission, et al. v. Purdue
Pharma L.P., et al., Marshall County Civil Action
Nos. 17-C-248 to 17-C-255,***

***Monongalia County Commission, et al. v. Purdue
Pharma L.P., et al., Marshall County Civil Action
Nos. 18-C-222 & 18-C-233 to 18-C-236***